

STATE OF OREGON) 3:23-mj-00183
) ss.
COUNTY OF MULTNOMAH) AFFIDAVIT OF K. Eric Gears

Affidavit in Support of a Criminal Complaint and Arrest Warrant

I, K. Eric Gears, being first duly sworn, hereby state as follows:

Introduction and Agent Background

1. I am a Postal Inspector with the United States Postal Inspection Service (USPIS) and have been since July 2015. I am currently assigned to the Portland, Oregon, Domicile Office of the USPIS. As a Postal Inspector, I am empowered by 18 U.S.C. § 3061 to conduct investigations and to make arrests for offenses against the United States. As part of my duties, I investigate crimes committed against Postal Service employees and facilities.

2. The facts set forth in this affidavit are based on my own personal knowledge; knowledge obtained from other individuals during my participation in this investigation, including other law enforcement officers; interviews of witnesses; my review of records related to this investigation; communications with others who have knowledge of the events and circumstances described herein; and information gained through my training and experience.

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3. I submit this affidavit in support of a criminal complaint and arrest warrant for:

- Corey James Jackson for theft of mail, in violation of 18 U.S. Code § 1708; burglary of a United States post office, in violation of 18 U.S. Code § 2115; robbery of mail, money, or other property of the United States, in violation of 18 U.S. Code § 2114; and felon in possession of a firearm, in violation of 18 U.S. Code § 922(g)(1).
- Melissa Ann Maxwell for burglary of a United States post office, in violation of 18 U.S. Code § 2115.

4. I am submitting this affidavit for the limited purpose of filing a criminal complaint in support of an arrest warrant for Corey Jackson and Melissa Maxwell. I did not include all the relevant facts known to me or other members of law enforcement regarding this investigation. I set forth in this affidavit only those facts necessary to support probable cause for the requested criminal complaint and arrest warrant.

Applicable Statutes

5. Title 18, U.S.C., Section 1708 (Theft of Mail) makes it unlawful to steal, take, or abstract from or out of any mail, post office, or station thereof, letter box, mail receptacle, or any mail route or other authorized depository for mail matter, or from a letter or mail carrier, any letter, postal card, package, bag, or mail, or abstract or remove from any such letter, package, bag, or mail, any article or thing contained therein, or secret, embezzle, or destroy any such letter, postal card, package, bag, or mail, or any article or thing contained therein.

6. Title 18, U.S.C. , § 2115 (Burglary of a U.S. Post Office) makes it unlawful to forcibly break into or attempt to break into any post office, or any building used in whole or in part as a post office, with intent to commit in such post office, or building or part thereof, so used, any larceny or other depredation.

7. 18 U.S.C. § 2114 (Robbery of Mail or Other Property of the United States) makes it unlawful to assault any person having lawful charge, control, or custody of any mail matter or of any money or other property of the United States, with intent to rob, steal, or purloin such mail matter, money, or other property of the United States, or to rob or attempt to rob any such person of mail matter, or of any money, or other property of the United States.

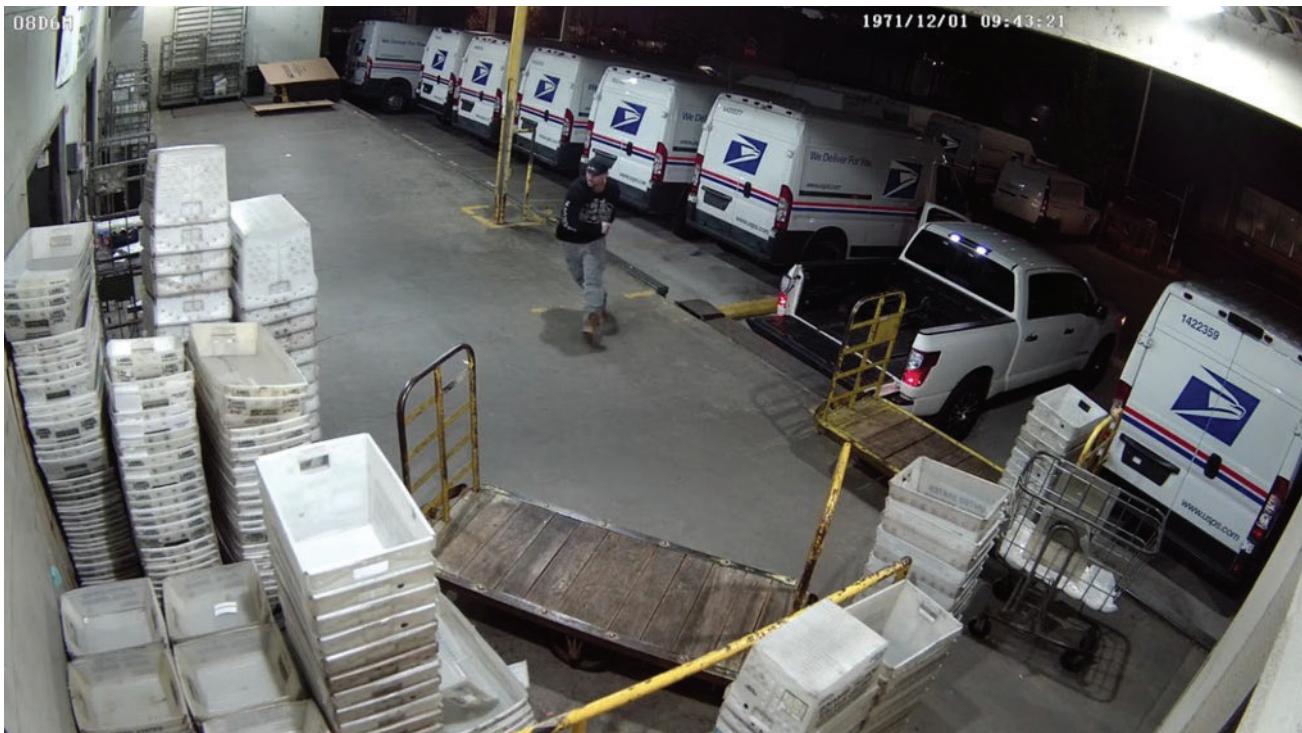
8. Title 18 U.S.C. § 922(g)(1) (Felon in Possession of a Firearm) makes it unlawful for any person who has been convicted in any court of a crime punishable by imprisonment for a term exceeding one year to possess in or affecting commerce, any firearm or ammunition.

Statement of Probable Cause

11/21/2022 – East Portland Post Office Theft of Mail

9. On 11/21/2022, Postal Inspectors responded to a report of theft from the loading dock area of the East Portland Post Office located at 1020 SE 7th Avenue, Portland OR 97214. At approximately 9:00 AM (PST), East Portland Post Office USPS employees witnessed an individual running out of the vestibule after stealing mail. Employees stated that the individual stole a tub of mail and a registry bag and drove off in a white Chevy Pickup Truck, with a lifted bed.

10. USPS surveillance video revealed the US Mail was placed by employees inside of the Post Office and staged to load on a USPS truck. The male suspect backed a white Nissan Titan truck up to the loading dock of the East Portland Station. The driver, matching the physical description of Corey Jackson, exited the truck, opened the tailgate, and jumped onto the loading dock. Jackson opened the vestibule door to the post office and wheeled out a hamper full of parcels, US Mail and a registry bag containing \$1,049 cash and \$696 in checks destined for bank deposit. Jackson pushed the hamper into the Nissan Titan

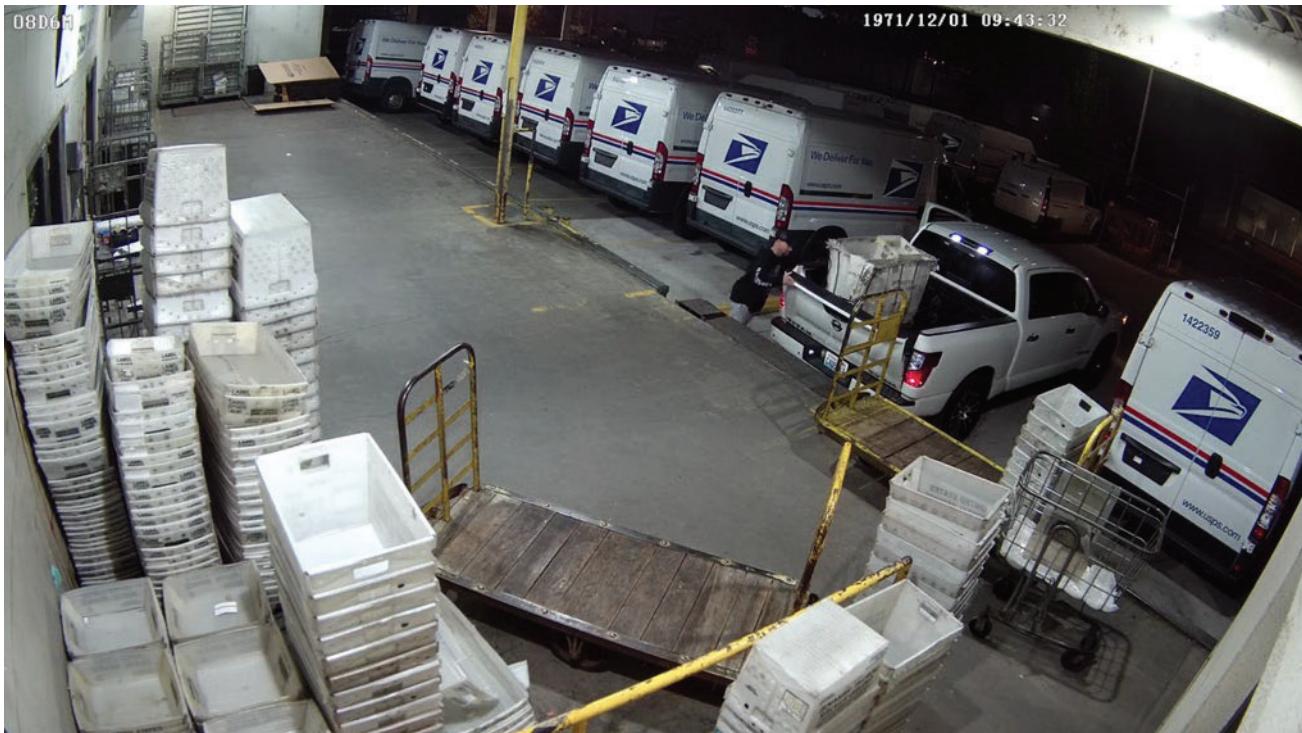


truck and drove away. A surveillance photo of Jackson loading the Nissan Titan truck is provided below:

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11. Surveillance video shows Washington State License Plate C40565X affixed to the Nissan Titan. DMV records show the plate was registered to Enterprise Rental. On October 16, 2022, the vehicle was rented under the name Gunther, Robert (DOB: xx/xx/1980), address 6400 NE Highway 99, Vancouver, WA 98665 and provided telephone numbers (XXX) XXX-5345, and (XXX) XXX-3760.¹ I know from training and experience that individuals that perpetrate fraud and steal mail, use stolen identity to rent vehicles to conduct criminal activity. I searched available Law Enforcement databases and learned that no Robert Gunther was associated to the listed address or date of birth. A search of Law Enforcement available databases shows phone number (XXX) XXX-3760 is associated with

¹ I personally know all redacted names, addresses, phone numbers and dates of birth but have not included them in order to protect the personal identifying information of the victims and have accordingly redacted all such information throughout this affidavit.

Txxxx Exxxx and phone number (XXX) XXX-5345 is associated with a business in California. I also learned that DMV records of Jackson revealed a home address located at 6400 NE Highway 99, #163 STE G, Vancouver WA 98665, the same street address, but adding the apartment number, given by the individual who rented the Nissan Titan.

01/23/2023 – Forest Park Post Office Burglary

12. On January 23, 2023, at 11:06 PM (PST), individuals matching the physical description of Cory Jackson and Melissa Maxwell burglarized the Forest Park Post Office, located at 2300 SW 6th Ave, Portland, OR 97201. Open source and social media posts associated to Jackson and Maxwell linked the two together as a couple and romantically involved. Surveillance video from the Forest Park Post Office reveals a silver Nissan Juke stopping on SW Caruthers St outside of the Post Office gate. Based on my review of the surveillance video, a person matching Maxwell's physical description is seen exiting the Juke and opening the gate. Then, a person who matches Jackson's physical description drives the Juke up to the building and then backs the Juke up from the building. Maxwell closes the gate and walks to the passenger door of the Juke and opens the door. Jackson exits the vehicle from the driver's door wearing a black beanie, dark grey/black pants, white tennis shoes, a long sleeve black t-shirt with a white Puma logo over the heart and white writing on the left sleeve along the forearm. Jackson has a surgical mask under his chin, which he pulls over his nose as he approaches the building. Maxwell is wearing a grey beanie, black pants with knee high black boots, a black hoodie sweatshirt with a design and a red undershirt.

13. Jackson and Maxwell check the doors to the rear of the Post Office. Jackson and Maxwell can be seen on video having a discussion. Jackson then walks to the gate, and

opens the gate and Maxwell drives the Nissan Juke out the gate onto SW Caruthers St. Jackson then closes the gate and jogs to the corner of the fence by the building and the loading ramp. Jackson climbs the fence and enters the construction site laydown area on the east side of the building. A surveillance photo of the Nissan Juke is provided below:



14. Maxwell drives the Juke to the construction site employee parking lot next to the laydown area on the northeast corner of the building. Jackson is observed pulling an object out of a bin in the construction laydown area and making a throwing motion towards the post office. Jackson then returns to the post office and climbs on top of a box located

outside of a window, looks at the window, climbs off the box and walks back through the construction site laydown area. Jackson returns to the box located outside the window and climbs back on top of the box again. Jackson is observed hitting the post office window area with what appears to be a sledgehammer.

15. The surveillance video reveals Jackson climbing through the window into the Forest Park Post Office. Jackson removes a postal tub from the post office and drops it right out of the window onto the ground next to the box. Jackson exits the post office through the window, picks up the tub containing US Mail and walks towards where Maxwell parked the Juke. Jackson hands the tray of US Mail over the fence to Maxwell, who places the tray in the rear driver's side area. Jackson exits the laydown area between the fence and the building; then enters the front passenger seat of the Juke and Maxwell enters the driver's seat. The Juke leaves the area.

16. I collected pieces of glass and tint from the broken window smeared with blood from the post office. I located blood inside the post office on a rack that was in front of the broken window.

**01/03/2023 – Tigard Police Department Responds to Residential Burglary
involving Theft of Firearms**

17. On January 3, 2023, Tigard Police Department investigated a burglary, where individuals matching the physical description of Jackson and Maxwell stole a gun safe containing multiple firearms. The reporting victim (Adult Victim) left his residence at 5:45 PM (PST) and returned at 7:20 PM (PST) to find the dog door on the side of the home removed and his gun safe missing. The Adult Victim contacted Tigard Police Department

and reviewed his security camera and Ring Doorbell camera.

18. Adult Victim's Ring Doorbell camera show Jackson walking up to the door and knocking; then walking away. A camera, located on the exterior of the residence, shows a silver Nissan Juke pull into the driveway and Jackson exit the driver's door. Jackson walks to the side of the house and exits from the front door four minutes later to grab a hand dolly sitting in front of the residence. Jackson reenters the residence with the dolly and exits again with the gun safe on the dolly. Maxwell exits the vehicle, assists Jackson with loading the gun safe into the Nissan Juke. When the gun safe does not fit, Maxwells pulls a black tote from the back of the Nissan Juke to make room for the gun safe. They load the safe into the Juke, depart the residence but leave the tote behind. Surveillance photos of Jackson and Maxwell are provided below:

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19. Inside the tote left behind at Adult Victim's residence, responding officers located US Mail from several zip codes, checks, and victim's personal identifying information. After being notified of the Tigard Police investigation, I contacted their property and evidence technician, who released the US Mail, checks and identity theft related evidence to USPIS. A review of the evidence revealed a piece of paper had an image of Cory Jackson's Washington State Driver's License photo printed on it. In addition, several pieces of paper had victim names, credit card numbers and expiration dates printed in the same format seen on credit/debit cards. Multnomah County Court paperwork for Cory James Jackson was also recovered from the black tote left behind at the residence in Tigard.

20. Tigard PD report stated Adult Victim knew Maxwell from a dating app, MeetMe. Adult Victim said Maxwell was using the name Jessica when he first met Maxwell. He learned Maxwell's first name was Melissa and she was also seeing a man named Cory Jackson. Adult Victim showed Melissa several of his firearms while the two dated. Adult Victim told officers he later received text messages from phone number (XXX) XXX-3760, which is the same phone number as the one associated with the rental of the white Nissan

Titan used during the theft of mail from the East Portland Post Office, alluding to Maxwell.

21. Adult Victim reported the stolen gun safe contained the following firearms: 870 Tactical Shotgun, manufactured by Remington Arms Co.; 1911 Series Pistol, manufactured by Rock Island Armory; a .357 Magnum/.38 Special pistol, manufactured by Bond Arms; a Savage .22 rifle, manufactured by Savage Arms Corp., a division of Emhart Corp.; and a Remington Model 700 rifle and separate green stock, manufactured by Remington Arms Co. Based on my training, experience, and independent research, none of these firearms are manufactured in Oregon. The firearms therefore moved in interstate commerce in order to be found in Oregon.

Corey Jackson's Felony Criminal History

22. In 2001, Jackson was convicted in Oregon of felony possession of a controlled substance, serving eighteen months' probation; in 2016, Jackson was convicted in Oregon of a felony burglary in the first degree, serving twenty months incarceration; in 2000, Jackson was convicted in Washington of felony forgery, serving 30 days incarceration; in 2005 Jackson was convicted in Washington of felony possession of stolen property, serving sixty days incarceration; in 2005 Jackson was convicted in Washington of felony possession of a controlled substance-methamphetamine, serving eighteen months incarceration; in 2007 Jackson was convicted in Washington of felony identity theft, serving forty-three months incarceration; in 2010, Jackson was convicted in Washington of felony identity theft, serving forty-three months incarceration; in 2014, Jackson was convicted in Washington of felony forgery, serving twenty-four months incarceration. Based on his criminal history, I believe that Corey Jackson knew he had been convicted of a crime punishable for a term exceeding

one year and is prohibited from possessing firearms.

10/03/2023 – Vancouver Police Department Detains Maxwell, but Jackson Eludes Arrest in Un-Plated Black Ford Explorer.

23. On October 3, 2023, 4:47 PM, I learned from Vancouver Police Department (VPD) that VPD detectives responded to the Springhill Suites, located at 1421 SE Tech Center for a report of a stolen vehicle. A representative of Enterprise Rent-A-Car called 911 and reported Enterprise was actively tracking a stolen 2023 Volkswagen Atlas bearing Washington license plate CFP111. The Enterprise representative told 911 dispatch the vehicle was traveling through Vancouver and became stationary with the ignition turned off at 1421 SE Tech Center Dr. The Enterprise representative stated the suspect renting the vehicle was identified as Cory J. Jackson with date of birth of xx/xx/1980.

24. Detectives located the Volkswagen Atlas bearing the rear Washington license plate CFPI 111 in the parking lot of the hotel. The Atlas was parked on the southside of the hotel facing north into the building. A black un-plated Ford Explorer was also parked in the immediate parking stall to the east of the Atlas. It was unknown at the time if the Explorer was related to the Atlas. Detectives contacted Vancouver Police Dispatch to conduct a routine check on the license plate of the Volkswagen Atlas and confirmed it was listed as an outstanding stolen vehicle.

25. During a search of Law Enforcement databases, detectives discovered Jackson had outstanding felony warrants from multiple law enforcement agencies, including a felony warrant out of the Clark County (WA) Sheriff's Office for Failure to Appear, Unlawful Possession of a Firearm in the 2nd Degree, and 2 counts Possession of a Machine Gun or

short barreled shotgun or rifle; an arrest warrant for Vehicle Theft out of the Maricopa County (AZ) Sheriff's Office Arizona; multiple warrants out of Multnomah County (OR) for Robbery, unlawful use of a weapon, felon in possession of a weapon, and kidnapping; a warrant for Failure to Appear and Dangerous Drugs out of the Nevada Highway Patrol; and a warrant for six counts Mail Theft and one count for Forgery out of the Clackamas County (OR) Sheriff's Office.

26. Detectives, as well as patrol officers, set up in the area to wait for Jackson to exit the hotel. A short time after, a male matching the physical description of Jackson exited the hotel with a female, later identified as Melissa Maxwell. Detectives converged on Jackson, who immediately fled into the driver's seat of the nearby un-plated black Ford Explorer. Jackson drove the Explorer over a sidewalk through grass and back out into parking lot. Marked Vancouver Police vehicles with their lights and sirens activated followed Jackson but he continued to evade and made no effort to stop. Jackson began driving through lights and into opposite lanes of traffic. Police units lost sight of the Explorer. Detectives prevented the female from fleeing in the Volkswagen Atlas.

27. Detectives detained Melissa Maxwell as she was still on scene and standing outside of the stolen Volkswagen Atlas. Maxwell initially identified herself as Melissa Self with a date of birth of xx/xx/1979. The detectives conducted routine checks of law enforcement databases and were unable to locate any record of Melissa Self. Detectives conducted a search of law enforcement databases for associates of Jackson and located an associate with the name of Melissa Ann Maxwell with the date of birth xx/xx/1979. Maxwell had outstanding arrest warrants from Multnomah County (OR), Washington

County (OR) and Maricopa County (AZ). Detectives confronted Maxwell with the information, and she stated was Melissa Maxwell and provided the correct date of birth of xx/xx/1979.

10/03/023 and 10/04/2023 – Maxwell Interviews

28. At the scene, VPD Detectives advised Maxwell she was under arrest for her outstanding warrants and read Maxwell her *Miranda* Rights from a preprinted Miranda Card and Maxwell stated she understood her rights. Maxwell stated she was willing to talk to detectives about crimes that Jackson recently committed in the Portland area. Maxwell was transported to Vancouver West Precinct, where she was placed in an interview room.

29. Maxwell stated to VPD detectives that she was in a relationship with Jackson for the past 3 years and met Jackson in Arizona. Maxwell stated approximately 1 month ago (beginning of September 2023), Jackson robbed a United States Postal Service mail carrier outside of The Matisse, an apartment complex located Portland, OR at 677 S Lowell St. Detectives asked Maxwell how she knew this, Maxwell stated she was not present for the robbery, but Jackson had shown back up at their hotel room immediately after the robbery and was in possession various mail and mailbox keys. Maxwell stated Jackson was driving the black Ford Explorer during the robbery of the mail carrier. Maxwell stated the robbery was in the news in Portland. Maxwell also stated Jackson went back to The Matisse a few days after the robbery and broke into the mailboxes and stole mail. Maxwell stated that was the third time Jackson had robbed a mail carrier at gun point. Maxwell stated Jackson frequently breaks into mail boxes and uses the information he steals from mail to make fake IDs and credit cards.

30. Later that same evening on October 3, 2023, at 9:30 PM (PST), Inspector Jason Calio and I spoke with Melissa Maxwell at the Clark County (WA) Detention Center. Maxwell provided knowledge of Jackson's criminal activity, including the robbery of three US mail carriers and burglaries of multiple Post Offices in the Portland metro area. Maxwell also gave information on the home burglary in Tigard where Jackson and Maxwell acquired firearms. In the conversation, Maxwell indicated she now felt unsafe in her relationship with Jackson and wanted to discuss Jackson's history of criminal activity with law enforcement. Maxwell said she was with Cory Jackson, but not a willing participant in the relationship. Maxwell stated she supplied Jackson drugs, and after she was indicted for Criminal Enterprise in Arizona, she and Jackson left for Oregon. Maxwell has active felony arrest warrants out of numerous states, and I believe she wanted to provide information of Jackson's activity to law enforcement to gain potential leniency in future judicial proceedings involving her crimes.

31. On October 4, 2023, at 8:30 AM (PST), Portland Police Bureau Detective Rachel Baer and I again interviewed Melissa Maxwell at the Clark County (WA) Detention Center concerning the same subjects. I read Maxwell her Miranda Rights from a preprinted card and Maxwell acknowledge she understood her Miranda Rights

32. A search of law enforcement databases determined Maxwell had an extensive criminal history, including a 1999 arrest in Tacoma, WA for Forgery; a 2003 arrest for Criminal Possession of a Forgery Device in Phoenix, AZ; a 2004 arrest for Issuing a Bad Check in Phoenix, AZ; a 2005 arrest for 3rd Degree Burglary in Phoenix, AZ; a 2006 arrest for Armed Robbery and Aggravated Assault in Phoenix, AZ; a 2017 arrest for Possession of

a Controlled Substance in Phoenix, AZ; and a 2022 arrest in Nevada for Possession of Controlled Substances and Forgery.

Maxwell Provides Information Concerning East Portland Post Office Mail Theft

33. During her October 3rd interview, Maxwell said Jackson stole a cart full of mail from a Post Office near SE 7th Ave, which based on my knowledge would be the East Portland Post Office. Maxwell said Jackson told her about the theft and saw the mail in the truck later on. Maxwell said Jackson loaded the cart into the back of a truck and took off.

34. On October 4th, I presented Maxwell a photo of Jackson on the East Portland Post Office back dock stealing the cart full of US Mail on November 21, 2022, and Maxwell confirmed it was Jackson in the photo. I asked Maxwell what type of truck was in the picture, she said it was Nissan truck. I know from the course of this investigation the truck is a Nissan Titan. I asked Maxwell how they obtained the Nissan truck, Maxwell stated they rented the truck. I believe, based on the investigation described above in paragraph 8, that this vehicle was rented by Jackson who used a fake name to do so.

35. Surveillance photo presented to Maxwell provided below:

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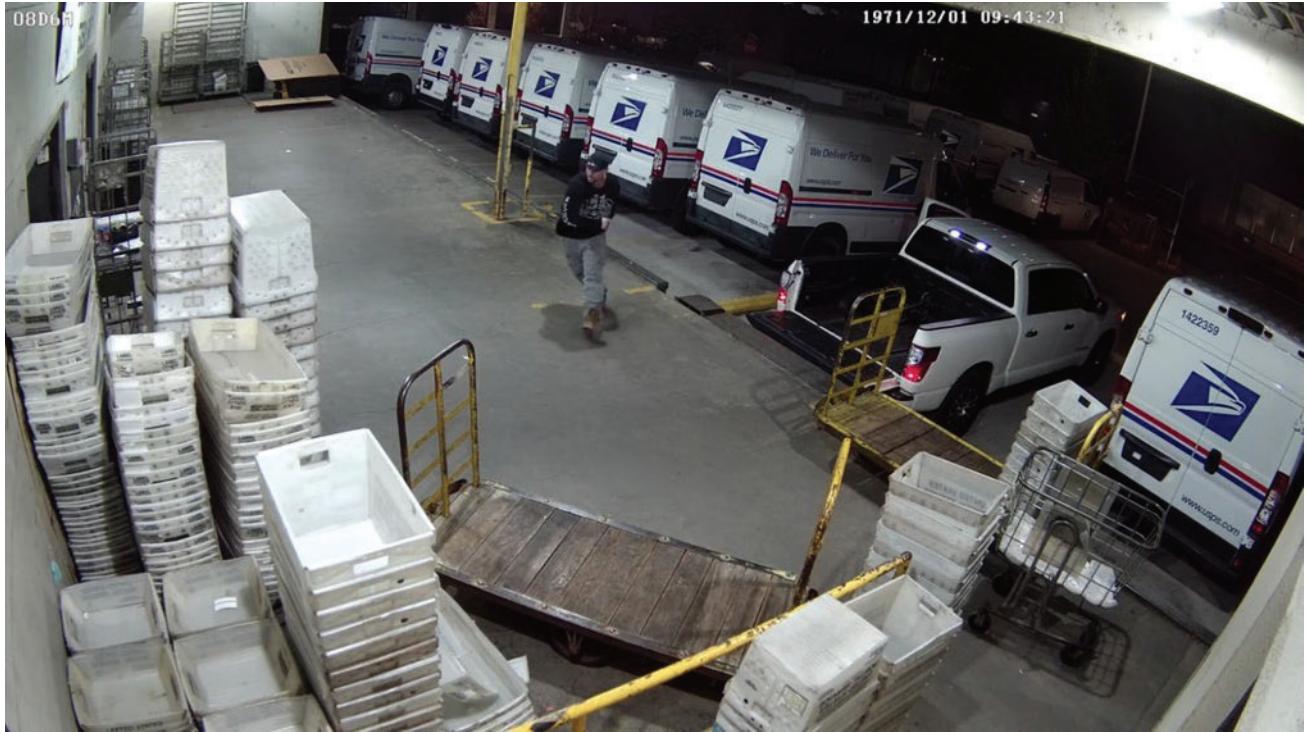
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Maxwell Provides Information Concerning Forest Park Post Office Burglary

36. During her October 3rd interview, Maxwell avoided talking about this burglary. However, she did state that Jackson had a gun the night Jackson burglarized the Forest Park Post Office after I asked her if he did.

37. On October 4th, I presented Maxwell a picture of the Forest Park Post Office burglary, Maxwell stated it was Jackson in the photo and the vehicle was a Nissan Juke. Maxwell stated Jackson purchased the vehicle using fraudulent IDs from Speed's Auto Auction. Surveillance photo presented to Maxwell provided below:

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**Maxwell Provides Information Concerning Tigard Burglary and Theft of
Firearms**

38. During the October 3rd interview, I asked Maxwell how Jackson is obtaining firearms. Maxwell said they came from a house in Tigard. Maxwell said she was driving a Juke, and they placed the guns in the back of the vehicle.

39. On October 4th, I presented Maxwell a photo from the burglary in Tigard and Maxwell confirmed it was Jackson in the photo. Maxwell told me Jackson entered the house somehow, then came out the front door with a gun safe. I told Maxwell gun safes are heavy, and asked how did Jackson get it out of the house. Maxwell stated Jackson had the gun safe on a dolly. Maxwell told me she and Jackson loaded the gun safe into the Juke and left. Maxwell did not want to discuss further details of the burglary in the interview. Maxwell stated she did not know what was going on until Jackson exited the residence. The surveillance photo of the Tigard burglary presented to Maxwell is provided below:



Maxwell Provides Information Concerning US Mail Carrier Robberies

40. I then questioned Maxwell about the three US Mail Carrier robberies believed to be perpetrated by Jackson in the Portland area.

12/04/2021 – NE 103rd Ave US Mail Carrier Robbery

41. I asked Maxwell about the armed robbery of a US Mail Carrier near NE 103rd Ave., Portland, OR. During the October 3rd interview, Maxwell said she was in the car when Jackson robbed the carrier at gun point. Maxwell said the vehicle was parked at a nearby Pho restaurant near the Leathers gas station. Maxwell said Jackson told her he robbed the carrier and took his keys including the car keys, but they threw the carrier's car keys out the window.

42. During the October 4th interview, Maxwell further stated Jackson told her at some point following the robbery that the mail carrier was tall with longer hair. Maxwell said it was after dark and raining the night of the armed robbery at NE 103rd Ave. Maxwell again said they were parked by a Pho restaurant, and Jackson came back to the car and said he robbed a mailman. Maxwell further stated that she and Jackson were living at 4837 NE

102nd Ave., Portland, Oregon, about one block away from the location of the robbery.

43. On December 4, 2021, at approximately 6:10 PM (PST) a US Mail Carrier was robbed at gun point of their issued Modified Arrow Lock (MAL) keys while on their postal route. It was after dark and raining at the time of the robbery; no US Mail or personal items were taken. According to the carrier, his postal vehicle was parked southbound on 4815 NE 103rd Ave, Portland, OR 97220 and the carrier was about to get into their postal vehicle, when a male approached them. The carrier thought it was a customer inquiring about a package. The carrier stated the male pointed a small black with dark gray revolver at him and told him "Give me your master key". The carrier handed the US Postal Service scanner to the male. The male dropped it to the ground. The male told the carrier "Give me your master key". The carrier handed the postal vehicle key to the male. The male said "no, the master key". The carrier handed the chain containing four MAL keys to the man. The carrier asked the male if he could leave and started walking southbound on NE 103rd Ave. The carrier described the person as either a white or Hispanic male, approximately 5'6" tall, wearing baggy dark blue or black with zippered sweater, a gray shirt inside, black face mask, baggy gray pants, medium length curly dark hair and sounded young in age. The carrier stated the male appeared from the alley of apartments located at 4815 NE 103rd Ave. The carrier believed the male headed northbound of NE 103rd Ave towards Sandy Blvd. The carrier stated he did not hear a vehicle starting or leaving the scene. A search of open-source databases confirms the location of both a Leathers gas station and a Vietnamese restaurant, Pho DaLat, located on the corners of NE 102nd Ave/NE 103rd Ave & Sandy Blvd., respectively, corroborating Maxwell's statements regarding the carrier robbery that night.

Additionally, I know from assisting with the investigation, the robbery occurred on a rainy evening and that the carrier had long hair, further corroborating Maxwell's statements.

09/20/2022 – NE Hancock US Mail Carrier Robbery

44. I asked Maxwell about a NE Hancock St., Portland, OR robbery of the US Mail Carrier at gun point. During the October 3rd interview, Maxwell told me a mail carrier robbery occurred near 8th and Schuyler (this is the intersection for Holladay Park Post Office) which is approximately three blocks away from the site of the robbery. Maxwell said Jackson told her about the robbery and she saw the keys. Maxwell said the carrier Jackson robbed was short. Maxwell stated Jackson was wearing a fisherman's hat. Maxwell said she was not with Jackson during that robbery and thought Jackson was using a white truck but said she couldn't really recall.

45. During the October 4th interview, Maxwell further stated she thought Jackson was just driving around in the area at the time. Maxwell again stated Jackson told her the mail carrier was a small guy.

46. On September 20, 2022, at approximately 3:00 PM (PST) a US Mail Carrier was robbed at gun point. The suspect stole the carrier's US mail arrow key and satchel. The carrier reported they were delivering mail to 1036 NE Hancock St, Portland, OR 97212 at approximately 3:00 PM PST. The carrier stated they saw the suspect approaching 1036 NE Hancock from his right side as the carrier entered the building. The carrier stated he did not notice the suspect prior to entering the building and thought the individual might have been following him as he delivered mail on NE Hancock St. The carrier stated he saw the suspect enter the building as he began delivering mail to 1036 NE Hancock St. The carrier stated

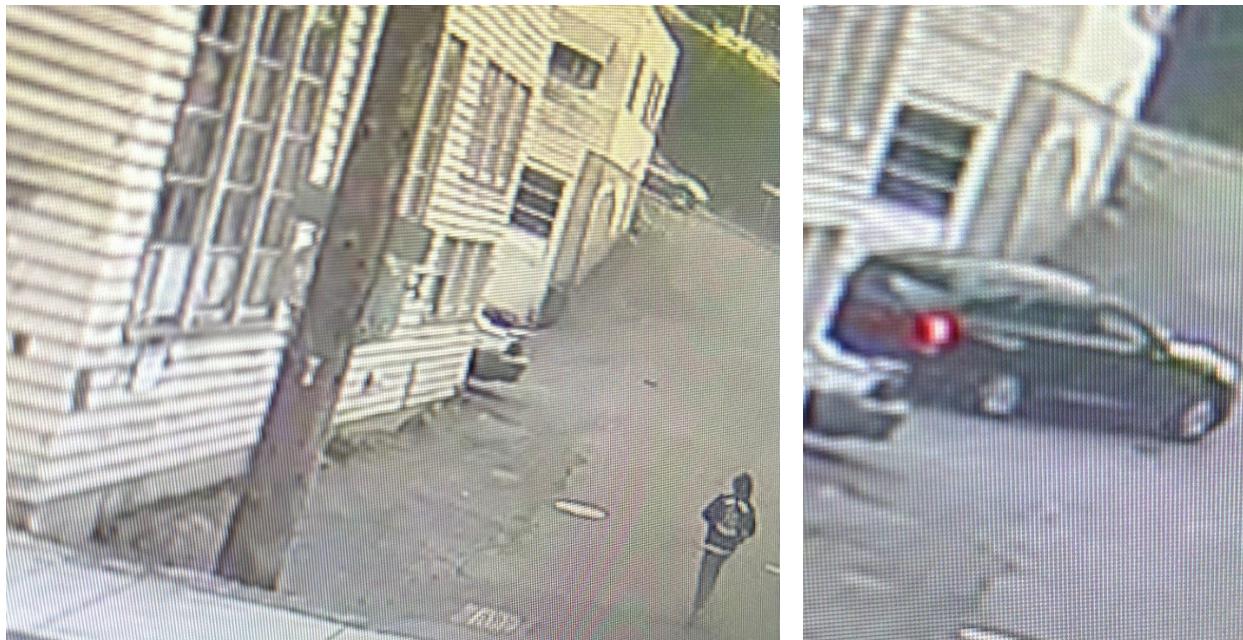
they heard a gun cock from behind him. The suspect demanded the carrier's keys and bag while pointing the gun towards the carrier's head. The carrier stated the suspect lifted the satchel from the carrier's person. The carrier stated the suspect then told them to get on the ground and fled the building. The carrier stated they followed the suspect out of the building and witness the suspect run west on NE Hancock St, but lost sight of the suspect. The carrier described the individual as a white male, between 5'6"-5'8", medium build, with heavy greying stubble wearing a tan fisherman's hat, black t-shirt, and possible black shorts. The carrier described the gun as a black semi-automatic pistol. In the interviews of Maxwell, she corroborates the carrier's description of Jackson wearing a fisherman's hat and the vicinity of the actual robbery. Additionally, I know from my investigation into the NE Hancock robbery that the US Mail Carrier is approximately 5'2" tall.

09/05/2023 – The Matisse US Mail Carrier Robbery

47. During the October 3rd interview, Maxwell said the third US Mail Carrier robbery occurred at The Matisse, 3939 S Bond Ave., Portland, OR 97239. Maxwell was in a vehicle nearby and did not see the robbery. Maxwell stated she and Jackson used to live at The Matisse several years ago, as well as The Olivia. Maxwell stated Jackson came back with tubs of mail and keys. Maxwell said Jackson was wearing a black leather jacket with South Side Serpents on the back and Jackson disposed of the jacket. Maxwell said they were driving a Ford Explorer at the time of the robbery, and Vancouver PD has the Explorer. Maxwell said the keys from the robbery were probably still in the Explorer or possibly the Volkswagen. In her interview with Vancouver PD, Maxwell stated she was not in the Explorer at the time but later saw the mail keys when Jackson returned back to their hotel

room.

48. On October 4th, I presented Maxwell photos from The Matisse letter carrier armed robbery on September 5th, 2023, Maxwell stated it was Jackson in the photo and again said the jacket Jackson was wearing said “Southside Serpents.” I showed Maxwell a picture of the vehicle I believe was used in the Matisse robbery, and Maxwell stated that should be the Ford Explorer. I asked Maxwell about the gun Jackson used during this armed robbery, Maxwell said it was not a real gun, but the rest of the robberies were real guns. I asked why Jackson targeted that area to rob the carrier, Maxwell stated that Jackson and Maxwell previously lived in that area and Jackson knew there was a lot of money there. Maxwell again stated the USPS keys should be in the Explorer. Surveillance photos of the Matisse robbery presented to Maxwell provided below:



49. On September 5, 2023, at approximately 7:25 PM (PST), a US Mail Carrier was robbed at gunpoint near 3939 S Bond Ave., Portland, OR 97239. The carrier stated they

started servicing the basement garage parcel lockers at 3939 S. Bond Ave. with no issues. The carrier took the elevator back up to the street level and began servicing the second half of the collection box units (CBU's) of the 3939 S. Bond Ave. mail room. The carrier stated they saw the male suspect upon servicing the CBU's and described the male as "lurking." The carrier stated the man would look around the CBU's towards the carrier and then leave and repeat. The carrier stated they believed at the time; the man may possibly be a customer looking for their mail but never inquired about it.

50. After completing the service of the CBU's at 3939 S. Bond Ave., the carrier stated they decided to exit the building toward 677 S. Lowell St. a different way than normal due to the man lurking about. The carrier exited towards the breezeway between the two buildings and saw the man leaning against a pillar on SW Bond Ave., staring at the carrier's USPS vehicle. The carrier walked to the door of 677 S. Lowell St. and pulled out USPS keys to enter the building. The carrier stated the man approached them and stated, "Hey, excuse me, I have a question for you." The carrier turned towards the man and saw the man pull out a black handgun, possibly from a fanny pack. The man then stated, "give me your keys." The carrier gave the keys to the man and the man stated, "get the fuck out of here." The carrier stated they walked towards the USPS vehicle parked on SW Bond Ave. but saw the man carrying away two tubs of mail/parcels from the carrier's pushcart the other direction around the corner of the breezeway, traveling south on S. Moody Ave. The carrier described the firearm resembling a, "Glock." A photo of the robbery is provided below:



51. The carrier described the man as: a white male, average build, 5'8"- 5'10" tall, wearing a blue surgical mask, blue eyes, clean kept and wearing a distinct black jacket with red/white embroidery on the back, possibly "snakes." The man stole US mail keys serial numbers 997 MAL 20005, 998 MAL 20077, building access fabs, and two tubs of delivery mail. Inspectors located surveillance footage of the suspect wearing a black jacket with a white design and lettering on the back. Surveillance footage shows after the robbery the man is seen entering an alley near 3939 S Bond Ave., Portland, OR, then a black Ford Explorer drives out of the alley several seconds later.

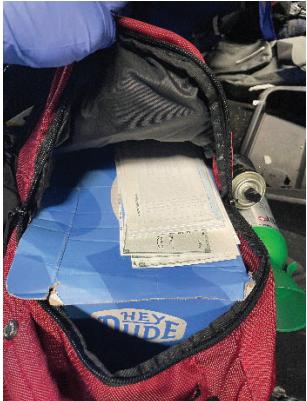
10/04/2023 – Search Warrant for Ford Explorer VIN 1FMSK8DH8LBB95368

52. Shortly after Maxwell's arrest, VPD recovered an abandoned un-plated black Ford Explorer believed to be the same vehicle Jackson evaded police from at the Springhill Suites in Vancouver. On October 4, 2023, Vancouver Police detectives applied for and was

granted a Search Warrant in the State of Washington for the Ford Explorer, VIN 1FMSK8DH8LBB95368. On October 5, 2023, VPD, Portland Police Bureau, and I executed the search warrant on the black Ford Explorer, VIN 1FMSK8DH8LBB95368.

53. During the search, officers located a grey satchel with webbing that matches the general description of the satchel observed on September 5, 2023, during the US Mail Carrier robbery at The Matisse in Portland, Oregon. Inside the satchel, officers located a pellet gun and the US Mail carrier's stolen keys. The serial numbers on the keys inside the satchel matched the stolen issued keys of the carrier on September 5, 2023. Counterfeit currency and other items associated to identity theft were recovered from multiple locations inside the Ford Explorer. The items recovered in the black Ford Explorer, specifically the pellet gun and the US Mail carrier keys, corroborate Maxwell's information provided during her interview, of Jackson's armed robbery of the US Mail Carrier at the The Matisse in Portland. Photos of the search warrant inside the vehicle are provided below:





54. I asked Maxwell why Jackson targets the US Mail, Maxwell stated Jackson knows he can get IDs, credit cards, and checks in the mail to get vehicles and money. Maxwell detailed how Jackson would use credit card statements to get credit card numbers, then Jackson would use an algorithm program to figure out the possible expiration date and try the combinations of card numbers and expiration dates until he found a combination that worked. I asked if Jackson uploaded the information on to credit/debit cards; Maxwell stated Jackson used to have a reader/writer until it was taken by law enforcement. Maxwell stated once the reader/writer was taken, Jackson would sand off the number of a credit card and replace the numbers on the front. Maxwell stated Jackson would alter the chip and magstripe, so the card number had to be entered manually.

55. I asked Maxwell how Jackson created the counterfeit IDs. Maxwell stated Jackson would use an emery board to sand off the picture. Jackson would then print the photo and other information on Avery sticky film and overlay the film on the altered ID.

56. Detective Baer asked Maxwell if Jackson counterfeited money. Maxwell stated that Jackson was doing it, but it was not lucrative. Maxwell stated when she first met Jackson, Jackson possessed a lot of counterfeit currency.

Conclusion

57. Based on the foregoing, I have probable cause to believe that:

- COREY JAMES JACKSON committed theft of mail, in violation of 18 U.S. Code § 1708; burglary of a United States post office, in violation of 18 U.S. Code § 2115; robbery of mail, money, or other property of the United States, in violation of 18 U.S. Code § 2114; and being a felon in possession of a firearm, in violation of 18 U.S. Code § 922(g)(1).
- MELISSA ANN MAXWELL committed burglary of a United States post office, in violation of 18 U.S. Code § 2115.

I therefore respectfully request that the Court issue a criminal complaint and arrest warrant charging JACKSON and MAXWELL with those offenses.

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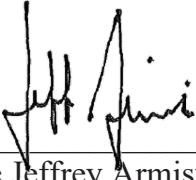
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58. Prior to being submitted to the Court, this affidavit and the requested criminal complaint were reviewed by Assistant United States Attorney (AUSA) Leah Bolstad. AUSA Bolstad told me that in her opinion, the affidavit is legally and factually sufficient to establish probable cause to support the issuance of the requested criminal complaint and arrest warrants.

(By telephone)

K. Eric Gearn
U.S. Postal Inspector

Sworn in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone at
3:15 am/pm on October 20, 2023.


Honorable Jeffrey Armistead
United States Magistrate Judge